

TIMOTHY ELDER (CA BAR NO. 277152)
KRISTOPHER A. NELSON (CA BAR NO. 342552)
TRE LEGAL PRACTICE
1155 Market Street, Tenth Floor
San Francisco, CA 94103
Telephone: (415) 873-9199
Facsimile: (415) 952-9898
Email: telder@trelegal.com, knelson@trelegal.com

S. Tomiyo Stoner (CA Bar No. 289246)
Undaunted Law Firm, P.C.
600 California St., Floor 7
San Francisco, CA 94108
Telephone: (214) 415-7340
E-mail: tstoner@undauntedlaw.com

Attorneys for Plaintiff

Kevin E. Gilbert, Esq. (SBN: 209236)
kgilbert@ohhlegal.com
Nicholas D. Fine, Esq. (SBN: 285017)
nfine@ohhlegal.com
ORBACH HUFF & HENDERSON LLP
6200 Stoneridge Mall Road, Suite 225
Pleasanton, CA 94588
Telephone: (510) 999-7908
Facsimile: (510) 999-7918

Attorneys for Defendant County of Alameda

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

LISAMARIA MARTINEZ,

Plaintiff,

v.

**COUNTY OF ALAMEDA, MELISSA
WILK, in her individual capacity, EVA HE,
in her individual capacity, MARIA LAURA
BRIONES, in her individual capacity,**

Defendants.

Case No. 3:20-cv-06570-TSH

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE ON RENEWED
MOTION FOR JUDGMENT AS A
MATTER OF LAW OR, IN THE
ALTERNATIVE, FOR NEW TRIAL**

Hearing Date: April 24, 2025
Time: 10:00 a.m.
Dept.: Courtroom E, 15th Floor
Judge: Hon. Thomas S. Hixson

**JOINT STIPULATION REGARDING BRIEFING SCHEDULE ON RENEWED
MOTION FOR JUDGMENT AS A MATTER OF LAW OR, IN THE ALTERNATIVE,
FOR NEW TRIAL**

Defendant's Rule 50 motion was filed on February 14, 2025. Due to the scope of the material in the motion, the parties find it reasonable to have additional time to respond and therefore stipulate to the following briefing schedule:

1. Plaintiff's Opposition to Defendant's Motion for Judgment as a Matter of Law or, in the Alternative, for New Trial will be due on March 10, 2025 (10-day extension);
2. Defendant's Reply to Plaintiff's Opposition to Defendant's Motion for Judgment as a Matter of Law or, in the Alternative, for New Trial will be due on March 27, 2025 (10-day extension); and
3. To accommodate the changed deadlines, the hearing currently scheduled for March 27, 2025 will be continued to April 24, 2025 or to a date convenient to the Court.

Respectfully submitted,

DATED: February 24, 2025

TRE LEGAL PRACTICE

/s/ Timothy Elder

Timothy Elder

Attorneys for Plaintiff

DATED: February 24, 2025

ORBACH HUFF & HENDERSON LLP

/s/ Nicholas D. Fine

Nicholas D. Fine

Attorneys for Defendants